

BROWN & CONNERY, LLP

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(Philadelphia and Vicinity)

**TRUSTEES OF IRON WORKERS DISTRICT
COUNCIL (PHILADELPHIA AND VICINITY)**
6401 Castor Avenue
Philadelphia, PA 19149

and

**IRON WORKERS DISTRICT COUNCIL
(PHILADELPHIA AND VICINITY)
BENEFIT & PENSION PLAN**
6401 Castor Avenue
Philadelphia, PA 19149

Plaintiffs,

vs.

JHE, INC.
306 Weathervane Commons
Richboro, PA 18954

Defendant.

**IN THE UNITED STATES
DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

CIVIL ACTION NO. 02-2795

***CERTIFICATION OF ATTORNEYS'
FEES AND OF NON-MILITARY
SERVICE***

I, Michael F. Schleigh, of full age, do hereby certify as follows:

I am an attorney with the law firm of Brown & Connery, LLP, attorneys for Trustees of Iron Workers District Council (Philadelphia and Vicinity), Iron Workers District Council (Philadelphia and Vicinity)(Benefit and Pension Fund),(hereinafter "Plaintiffs") and am authorized to make this certification on their behalf.

1. I have personal knowledge of the facts set forth below.
2. On June 5, 2002, Plaintiffs filed a complaint in the United States District Court for the District of New Jersey against defendant, JHE, Inc. (the "Defendant").

3. The Complaint demanded, *inter alia*, money damages based upon Defendant's breach of the Collective Bargaining Agreement, together with attorneys' fees and costs of suit.

4. The attorneys' fees are payable based upon the agreement of the parties and also pursuant to Sections 4301(b) and 502(g) of the Employee Retirement Income Security Act as amended ("ERISA"), 29 U.S.C. §§ 1451(b) and 1132(g), as set forth in the Complaint.

5. The time entries prefixed by attorney code # 010 pertain to legal services performed by Steven G. Wolschina, Esquire, a senior partner with the law firm of Brown & Connery, LLP, who has represented Plaintiffs in various matters for approximately six years. Mr. Wolschina's usual hourly rate for this client is \$250.00. However, in this action his hourly rate is \$175.00.

6. The time entries prefixed by attorney code # 047 pertain to legal services that were performed on behalf of Plaintiffs by Stephanie Nolan Deviney. Ms. Nolan Deviney is an associate with the law firm of Brown & Connery, LLP. Ms. Nolan Deviney's usual hourly rate is \$175.00.

7. The time entries prefixed by attorney code # 112 pertain to legal services that were performed on behalf of Plaintiffs by me. I am an associate with the law firm of Brown & Connery, LLP. My usual hourly rate is \$125.00.

8. Attached hereto as Exhibit "A" is a true and accurate copy of the time records and a report of the costs of this litigation of Brown & Connery, LLP related to this action to enable the Court to see the exact nature and scope of the legal services which Brown & Connery, LLP necessarily performed.

9. Plaintiffs make this application for allowance of attorneys' fees for professional services rendered and reimbursement of actual and necessary costs and expenses incurred in the enforcement of the action in the total amount of \$1,720.44.

10. I am familiar with the Soldiers' and Sailors' Relief Act, 50 U.S.C. 501 et seq.
and

particularly familiar with the sections of said statute which define persons in the military service of the United States of America.

11. Defendant, JHE, Inc. is a corporation and thus, not presently in the military service of the United States of America or any of its allies.

12. Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

BROWN & CONNERY, LLP
Attorneys for Plaintiffs

Dated: December 3, 2002

By: /s/Michael F. Schleigh
Michael F. Schleigh